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United States Department of Transportation
Dockets Management Facility
Room PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590

To Whom It May Concern:

Federal Highway Administration Docket FHWA-2001-8954-24
National Bridge Inspection Standards

Following are our comments in response to the advance notice of proposed rule making solicitation relative to the above referenced docket. An unsigned copy of these comments has been submitted electronically to the website listed in the Federal Register solicitation.

Application of Standards

- The FHWA should develop a definition of a "bridge" unique for the purpose of the National Bridge Inventory (NBI) Program.
- The FHWA definition of "bridge" should clarify vagueness relative to bridge ownership. Ownership of the structure should be tied to or defined with regard to the land ownership.
- The FHWA definition of a "bridge" should address vagueness relative to the inspection of privately owned bridges over public roads.
- The FHWA definition of a "bridge" should retain the >20 ft length criteria.
- The FHWA definition should address the issue of whether railroad bridges and pedestrian bridges over public roads are subject to the National Bridge Inspection Standards (NBIS). The current language reference to "... carrying traffic or other moving loads ..." is open to interpretation.
- Any change in the "ownership" definition could have significant economic impacts.

Inspection Procedures

- Retain five years as maximum frequency for underwater inspections. Set appropriate criteria for owner application of extension of maximum frequency.
- Retain two year maximum inspection frequency. Qualify criteria for owner application of extension of inspection frequency to four years.
- Technical Advisory (TA) 5140.23 should not be included in the NBIS as written.
- The NBIS should include language similar to that included in TA 5140.23, 4.e.3, relative to bridge inspection reporting procedures for scour situations.
- Any guidance or requirements relative to scour inspection during a storm or flood event must have the safety of the inspector as the primary consideration.

Qualification of Personnel

- Individuals involved in the inspection program, including registered professional engineers, should have initial and on-going training.
- A requirement that all bridge inspections be performed by registered professional engineers is not supported. The NBIS must allow for non-degree bridge inspectors with the appropriate experience and training.
- The NBIS should include an engineering in training component.
- Specificity in the NBIS relative to civil or structural disciplines is not supported.
- Additional training requirements for “complex” structures is supported. However, the definition of “complex”, and the associated training, needs to be specific and reasonable. A formal certification program should not be required.
- Specific requirements relative to the inspector’s physical characteristics (i.e. vision, mobility, etc.) must not be made part of the NBIS.

Inspection Report

- An element of the NBIS could be a requirement that all bridge owners have an established process for correcting errors/”blunders” on inspection reports. Key to this process is an assumption of responsibility for the change by the individual making the change.

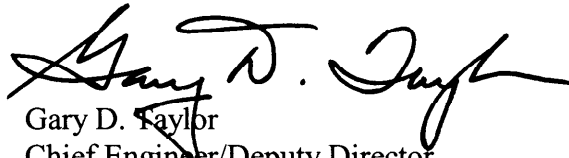
Inventory

- NBIS inventory items are not surveyed with every routine inspection unless there is reason to believe a physical change has taken place. A “trigger” possibly (every ten years) could be established for the reassessment of all inventory items.

Additional General Comments

- Since the NBI is used in the apportionment of federal bridge funds to the states, it would be desirable for the NBIS to include a communication element that would facilitate regular, on-going interaction/dialogue between the states. The goal of this communication element would be a sense or feeling of “fairness” or equity among the states relative to the uniformity and consistency of their inspection programs, the NBI data, and ultimately the apportionment of federal bridge funds. The FHWA should sponsor (fund) and facilitate this communication element.

Sincerely,



Gary D. Taylor
Chief Engineer/Deputy Director
Bureau of Highway Technical Services